

### REMARKS

The applicant has carefully reviewed the application in light of the Office Action dated April 18, 2007. Applicant amends claims 1, 9, 16, and 20. The amendments to the claims have only been done to expedite the prosecution.

### Claim Rejections – 35 U.S.C. §102

The Examiner has rejected claims 1-28 under 102(e) as being anticipated by U.S. Patent No. 6,813,609 B2 ("*Wilson*"). In addition, claims 16-19 and 20-28 are rejected under 102(b) as being anticipated by WO 97/24689 ("*Giordano*"). Applicants respectfully traverse these rejections for the following reasons.

For example, amended independent claim 1 recites a controller "adapted to determine a type of payment device used by the customer, determine, as a function of the type of payment device used by the customer, a group associated with the customer independent of identifying the customer, and direct the service equipment to provide services to the customer at a discounted price based, at least in part, on the determined group." In particular, discounted services are based on a group associated with the customer independent of identifying the customer. Independent claims 9, 16, and 20 recite similar limitations. In contrast, *Wilson* and *Giordano* merely teach providing discounts earned by and assigned to specific individuals. In other words, such discounts are only provided by identifying a specific individual, not by determining a group independent of identifying the customer. Accordingly, Applicant respectfully request reconsideration and allowance of claim 1, 9, 16, and 20 and their respective dependents.

CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all Claims.

If the present application is not allowed and/or if one or more of the rejections is maintained, Applicants hereby request a telephone conference with the Examiner and further request that the Examiner contact the undersigned attorney to schedule the telephone conference.

The RCE filing fee in the amount of **\$790** is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization.

No other fees are believed due. However, should there be a fee discrepancy, please apply any deficiencies or any other required fees or any credits to deposit account 06-1050, referencing the attorney docket number shown above.

Respectfully submitted,

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